

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:	:	
Desiree M. Dennison	:	Case No. 17-23368-GLT
Patrick W. Dennison	:	
Debtor(s)	:	Chapter 13
	:	
Pennymac Loan Services, LLC, its	:	
successors and/or assigns	:	
Movant(s)	:	Related to Document 84
	:	
vs.	:	Hearing Date: 3/8/23 at 9:30 a.m.
	:	
Desiree M. Dennison	:	
Patrick W. Dennison	:	
Ronda J. Winnecour, Trustee	:	
Respondent(s)	:	

TRUSTEE'S RESPONSE TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY
AS TO PROPERTY LOCATED AT 1035 GRANITE DRIVE, McDONALD, PA 15057

Ronda J. Winnecour, Chapter 13 Standing Trustee, respectfully represents the following:

1. PennyMac Loan Services, LLC, its successors and/or assigns requests relief from stay with regard to property located at 1035 Granite Drive, McDonald, PA 15057.
2. Debtors' Schedules reflect that the fair market value of the property is \$319,000.00 and Debtors have claimed an exemption of \$47,350.00 under 11 U.S.C. § 522(d)(1).
3. Movant is the sole lienholder against the property with a claim in the amount of \$236,555.24.
4. Debtors' monthly payments to Trustee are consistently lower than the confirmed plan payment amount of \$3,936.00, and Debtors are currently in arrears in the amount of \$ \$19,067.62.
5. Despite the current arrearage, Debtors appear to have a substantial equity

cushion in the property in the amount of \$35,094.76, which should be preserved for the benefit of the estate.

WHEREFORE, the Trustee so reports to the Court.

RONDA J. WINNECOUR,
CHAPTER 13 TRUSTEE

Date: February 17, 2023

By: /s/ James C. Warmbrodt
James C. Warmbrodt, PA I.D. 42524
Attorney for Chapter 13 Trustee
US Steel Tower, Suite 3250
600 Grant Street
Pittsburgh, PA 15219
(412) 471-5566
jwarmbrodt@chapter13trusteewdpa.com

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:	:	
Desiree M. Dennison	:	Case No. 17-23368-GLT
Patrick W. Dennison	:	
Debtor(s)	:	Chapter 13
	:	
Pennymac Loan Services, LLC, its	:	
successors and/or assigns	:	
Movant(s)	:	Related to Document 84
	:	
vs.	:	Hearing Date: 3/8/23 at 9:30 a.m.
	:	
Desiree M. Dennison	:	
Patrick W. Dennison	:	
Ronda J. Winnecour, Trustee	:	
Respondent(s)	:	

CERTIFICATE OF SERVICE

I hereby certify that on the 17th of February 2023, I served one true and correct copy of the foregoing document on the following parties in interest by United States first-class mail, postage prepaid, addressed as follows:

Marta E. Villacorta, Esquire
Assistant U.S. Trustee
Suite 970, Liberty Center
1001 Liberty Avenue
Pittsburgh, PA 15222

Desiree and Patrick Dennison
1035 Granite Drive
McDonald, PA 15057

Kenneth Steidl, Esquire
Steidl & Steinberg
707 Grant Street, Suite 2830
Pittsburgh, PA 15219

Brian Nicholas, Esquire
KML Law Group
701 Market Street, Suite 5000
Philadelphia, PA 19106-1532

/s/Rosa M. Richard
Office of Chapter 13 Trustee
US Steel Tower – Suite 3250
600 Grant Street
Pittsburgh, PA 15219
(412) 471-5566
cmecf@chapter13trusteedpa.com